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Attorney for Yun's Corporation and Town, Inc.

**UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS**

U.S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION,

Plaintiff,

vs.

YUN'S CORPORATION and
TOWNHOUSE, INC.,

Defendant(s).

Civil Action No. 07-0031

**DEFENDANTS' INITIAL
DISCLOSURES**

Date: April 14, 2008

Time: 9:00 A.M.

Hon. Alex R. Munson

Yun's Corporation ("Yun's") and Town, Inc. ("Townhouse") make their initial disclosures under Fed.R.Civ.P. 26.

1. Persons likely to have discoverable information

a) Mr. Ho Jin Yoon, vice-president of Yun's Corporation and President of Town, Inc., at the time, has information about the hiring of Ms. Divina-Cruz and the decision to not offer her a new contract of employment with Yun's Corporation. He also has information about her temporary work at Town, Inc., and her work habits.

b) Mr. Daniel Taitingfong, personnel manager for Yun's Corporation at the time, has information about the decision by Yun's Corporation not to offer Ms. Divina-Cruz a new contract of employment with Yun's

1 Corporation after one year's service. He also has information about her temporary
2 work at Town, Inc.

3 c) Mr. Arsenio Blancia, stock clerk at Town, Inc. has information
4 about Ms. Divina-Cruz' unauthorized absence from Townhouse.

5 c) Any other witnesses will depend upon Plaintiff's proposed
6 proof and demands and its disclosure of any other alleged class members, which it
7 has refused to do thus far.

8 2. Documents:

9 Yun's Corporation has supplied the EEOC with documents on Ms.
10 Divina Cruz's employment with Yun's Corporation.

11 There is no applicable insurance policy.

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13 Respectfully submitted,

14 RICHARD W. PIERCE LAW OFFICE, LLC

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16 Date: April 3, 2008

17 _____/s/
18 Richard W. Pierce
19 Attorney for Yun's Corporation and Town, Inc.
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